

REMARKS/ARGUMENTS

Claims 7-15 and 57-67 were pending for examination. All other original claims have been withdrawn from examination. Claims 7, 11, 15, 57, and 61 have been amended herein. New claims 68-77 have been added. Upon entry of this amendment, claims 7-15 and 57-77 will be pending for examination. Fees for an RCE, extension of time, and added claims are included herewith.

The Examiner has maintained his rejection of all of Applicant's pending claims under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent 5,737,529 to Dolin Jr. et al. ("Dolin"). For a rejection under section 102 to stand, each and every recitation as set forth in the claim must be found in the cited reference. M.P.E.P. 2131. What is meant by a recitation in a claim being "found" in a cited reference is that the structure, technical concept, process, etc. recited in the claim language must be discussed, taught, or disclosed in the cited reference. There are significant differences between Applicant's invention as claimed and the disclosure of Dolin.

Applicant's invention, as disclosed and claimed herein, contemplates a system in which an underlying networking infrastructure is transparent to the definition of inputs in the system. A virtual input according to this concept is a single stored value representing a Boolean result that indicates the state of the premises. A state of the premises in the context of Applicant's claimed invention is something that would have a standard, understandable, broad meaning and relevance without having to resort to interpreting extensive program code and this state of the premises results from mapping multiple entries into a single virtual input. For example, one standard meaning could be whether any outside doors are open. In such a case the single virtual input represents more than the condition or state of a single switch or sensor. Applicant calls the manner in which the status of multiple physical or other inputs can be represented by a single virtual input, "input aliasing." Dolin by contrast, represents inputs via complex algorithms, which can be observed by viewing the tables presented in Dolin. These "tables" contain substantial amounts of program code. Thus, Dolin teaches away from the solution of Applicant's invention, which provides an elegant way in which users can alias inputs together without having to write code or understand underlying network protocols, and in fact without even caring or having to know whether an input is local or networked. Inputs can be

aliased according to Applicant's invention with no network traffic occurring.

Applicant's claims, as amended, all recite a "logical relationship" that produces a "single Boolean outcome" for a "single virtual input" to "represent a standard meaning for a state of the premises." These recitations are supported in the specification in Paragraph [0010], the latter part of Paragraph [0030], and the fifth sentence of Paragraph [0049]. These recitations are contained in all of Applicant's independent claims. These same recitations are contained in all of Applicant's dependent claims through their dependency. Applicant submits that the claims as amended are patentably distinguishable from Dolin.

Applicant notes that the Examiner has cited specific portions of Dolin as including teachings which correspond to various recitations in Applicant's claims. For example, the Examiner has pointed to Tables I, II, IX and XI as illustrating a Boolean result on which a logical relationship operates to produce a virtual input, which by definition is represented by a single Boolean outcome. But these tables in Dolin illustrate complex algorithms which take into account an underlying network protocol in order to represent inputs to the system of Dolin. There is no logical relationship that produces a single virtual input. The Examiner has cited Column 11, lines 59-67, and Column 12, lines 1-23 of Dolin for teachings related to the same recitations. Applicant can find no such discussions or teachings in this section of Dolin, but rather only a generalized discussion of assigning names to connections and nodes within a network. A user of a system employing Applicant's invention does not need to take these extra steps. Again, Applicant reminds the Examiner that for recitations to be found in a reference, the actual technical concepts must be discussed. Applicant can find no discussion, or even terminology in these sections of Dolin which is related to Applicant's invention.

Applicant has added new claims 68-77 to further specify additional, optional features of his invention. Claims 68, 70, 72, 74, and 76 recite that the format of the input identifiers used in Applicant's input aliasing invention is such that the identifier alone can specify "any of a plurality of distributed inputs in the premises automation system." Dolin teaches away from such a concept since resources in Dolin are specified by network constructs followed by a compilation process.

New claims 69, 71, 73, 75, and 77 further specify that the input identifier format

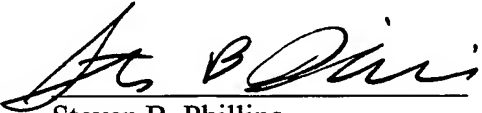
can include an input number and a unit number. There is no discussion or suggestion in Dolin of such a designation scheme, which again allows a user to specify a variety of inputs without resorting to networking constructs or writing code.

The Examiner has failed to show that every element of any claim is present in the art cited. Applicants believe they have responded to all of the concerns raised by the Examiner. Reconsideration of this application as amended is hereby requested.

Respectfully submitted,

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Date: 17 July 06

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